

1 Kathleen Bliss  
2 NV Bar No. 7606  
3 Kathleen Bliss Law PLLC  
4 170 South Green Valley Parkway, Suite 300  
5 Henderson, NV 89012  
6 Telephone: (702) 318-7375  
7 Email: kb@kathleenblisslaw.com

8  
9 Eleanor Hamburger (*Pro Hac Vice*)  
10 Ari Robbins Greene, Of Counsel (*Pro Hac Vice*)  
11 Sirianni Youtz Spoonemore Hamburger PLLC  
12 3101 Western Avenue, Suite 350  
13 Seattle, WA 98121  
14 Telephone: (206) 223-0303  
15 Email: ehamburger@sylaw.com  
16 arobbinsgreene@sylaw.com

17 Additional co-counsel listed on signature page  
18 ATTORNEYS FOR PLAINTIFF AND PROPOSED CLASSES

19  
20 UNITED STATES DISTRICT COURT  
21 DISTRICT OF NEVADA  
22 SOUTHERN DIVISION

23 IRENA STANIC RASIN, on her own  
24 behalf, and on behalf of all similarly situated  
25 individuals,

26 Plaintiff

27 v.

CIGNA HEALTH AND LIFE INSURANCE  
COMPANY,

Defendant

Case No. 2:25-cv-00407-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
FOR MOTION TO DISMISS**

(FIRST REQUEST)

[ECF No. 28]

28 **STIPULATION**

29 The parties have met and conferred regarding a proposed briefing schedule for  
30 Defendant's pending Motion to Dismiss (ECF #23) and hereby stipulate to extend the  
31 current deadlines as follows:

1 Plaintiff's response brief shall be extended from the current deadline of May 30,  
 2 2025 up to and including **June 16, 2025**.

3 The parties further agree to stipulate to extend the time for Defendant's reply brief  
 4 up to and including **July 1, 2025**.

5 The additional requested time is needed to accommodate the schedules of counsel,  
 6 including their respective workloads and other deadlines. The request will also provide  
 7 sufficient time for the parties to adequately assess the relevant arguments in the motion and  
 8 prepare their respective responses. This is the first request for an extension of time to  
 9 respond to the Motion to Dismiss. This request is made in good faith and not for the  
 10 purpose of delay.

11 DATED: May 21, 2025.

12 s/ Kathleen Bliss  
 13 Kathleen Bliss  
 14 NV Bar No. 7606  
 15 KATHLEEN BLISS LAW PLLC  
 16 170 South Green Valley Parkway, Suite 300  
 17 Henderson, NV 89012  
 18 Telephone: (702) 318-7375  
 19 [kb@kathleenblisslaw.com](mailto:kb@kathleenblisslaw.com)

20 s/ Eleanor Hamburger  
 21 Eleanor Hamburger (*Pro Hac Vice*)  
 22 Ari Robbins Greene, Of Counsel (*Pro Hac  
Vice*)  
 23 SIRIANNI YOUTZ SPOONEMORE  
 24 HAMBURGER PLLC  
 25 3101 Western Avenue, Suite 350  
 Seattle, WA 98121  
 Telephone: (206) 223-0303  
[ehamburger@sylaw.com](mailto:ehamburger@sylaw.com)  
[a Robbins Greene@sylaw.com](mailto:a Robbins Greene@sylaw.com)

26 s/ Ethan D. Thomas  
 27 Ethan D. Thomas, Nevada Bar No. 12874  
 LITTLER MENDELSON, P.C.  
 3960 Howard Hughes Pkwy, Suite 300  
 Las Vegas, NV 89169-5937  
 Telephone: (702) 862-8800  
[edthomas@littler.com](mailto:edthomas@littler.com)

Joshua B. Simon (*Pro Hac Vice Pending*)  
 Warren Haskel (*Pro Hac Vice Pending*)  
 Richard W. Nicholson, Jr. (*Pro Hac Vice Pending*)  
 Richard D. Diggs (*Pro Hac Vice Pending*)  
 McDermott Will & Emery LLP  
 One Vanderbilt Avenue  
 New York, NY 10017-3852  
 Telephone: (212) 547-5400  
[jsimon@mwe.com](mailto:jsimon@mwe.com)  
[whaskel@mwe.com](mailto:whaskel@mwe.com)  
[r nicholson@mwe.com](mailto:r nicholson@mwe.com)  
[rdiggs@mwe.com](mailto:rdiggs@mwe.com)

1 Anna P. Prakash (*Pro Hac Vice*)  
2 NICHOLS KASTER, PLLP  
3 80 S. Eighth Street, Suite 4700  
4 Minneapolis, MN 55402  
5 Telephone: (877) 344-4628  
6 [aprakash@nka.com](mailto:aprakash@nka.com)

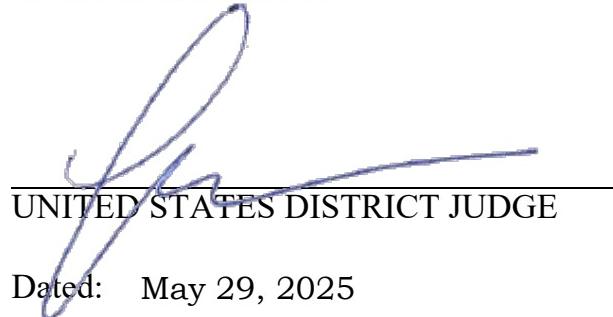
7 Kevin Costello (*Pro Hac Vice*)  
8 Center for Health Law & Policy Innovation  
9 Harvard Law School  
10 1585 Massachusetts Avenue  
11 Cambridge, MA 02138  
12 Telephone: (617) 496-0901  
13 [kcostello@law.harvard.edu](mailto:kcostello@law.harvard.edu)

14 **Attorneys for Plaintiff**

15 Brett Boskiewicz (*Pro Hac Vice*)  
16 Forthcoming)  
17 MCDERMOTT WILL & EMERY LLP  
18 200 Clarendon Street  
19 Boston, MA 02116  
20 Telephone: (617) 535-4000  
21 [bboskiewicz@mwe.com](mailto:bboskiewicz@mwe.com)

22 **Attorneys for Defendant**  
23 **Cigna Health and Life Insurance**  
24 **Company**

25 IT IS SO ORDERED:

26   
27 UNITED STATES DISTRICT JUDGE

28 Dated: May 29, 2025